

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

PAULA JOHNSON,

Case No. 09-CV-600 (JRT/JSM)

Plaintiff,

v.

HOMEOWNERSHIP
PRESERVATION FOUNDATION,

**AFFIDAVIT OF MEGHAN E. LIND
IN SUPPORT OF MOTION TO
DISMISS BY HOMEOWNERSHIP
PRESERVATION FOUNDATION**

Defendant.

STATE OF MINNESOTA)
)
) ss.
COUNTY OF HENNEPIN)

Meghan E. Lind, being duly sworn under oath, alleges and states the following:

1. I am an attorney with the law firm of Dorsey & Whitney LLP, 50 South Sixth Street, Suite 1500, Minneapolis, Minnesota 55402, and we represent Defendant Homeownership Preservation Foundation in this matter. I submit this affidavit in support of the Memorandum of Law in Support of the Motion to Dismiss by Homeownership Preservation Foundation.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Original Complaint & Application for Declaratory Relief in *Johnson v. American Sec. Ins. Co., et al.*, No. 1:09-MI-0011 (N.D. Ga. filed Jan. 9, 2009).

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's Original Complaint & Request for Declaratory Judgment in *Johnson v. Ocwen Loan Servicing*, No. 09-80079 CIV-DIMITROULEAS (S.D. Fla. filed Jan. 21, 2009).

4. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff's Original Complaint & Application for Injunctive Relief in *Johnson v. Illinois Dep't of Fin. & Prof'l Regulations, et al.*, No. 09CV93 (N.D. Ill. filed Jan. 8, 2009).

5. Attached hereto as **Exhibit D** is a true and correct copy of the Opinion in *Johnson v. Dobson, et al.*, No. 99-3405 (8th Cir. filed Oct. 4, 2000) (affirming dismissal of Plaintiff's lawsuit against Chrysler Corporation based on binding settlement agreement).

6. Attached hereto as **Exhibit E** is a true and correct copy of the Internet posting entitled "This Page Is Dedicated To The Truth," *available at* <http://members.fortunecity.com/paulajohson/> (last visited Mar. 23, 2009), setting forth the purportedly confidential settlement Plaintiff received in her lawsuit against Chrysler Corporation where Plaintiff received \$90,000.00 and her attorneys received \$60,000.00.

7. Attached hereto as **Exhibit F** is a true and correct copy of an Internet article entitled "Woman claims her lawyer failed to show up in courtroom," by Kelly Holleran, THE MADISON ST. CLAIR RECORD (Feb. 3, 2009), *available at* <http://www.madisonrecord.com/news/217174-woman-claims-her-lawyer-failed-to-show-up-in-courtroom> (last visited Mar. 23, 2009), in which Plaintiff claims she was being represented "in a number of cases."

8. Attached hereto as **Exhibit G** is a true and correct copy of an Internet article entitled "Pit bulls' owner blamed in St. Clair County personal injury suit," by Ann Knef, THE MADISON ST. CLAIR RECORD (Mar. 17, 2008), *available at* <http://www.madisonrecord.com/news/209366-pit-bulls-owner-blamed-in-st.-clair-county->

[personal-injury-suit](#) (last visited Mar. 23, 2009), describing a personal suit brought by Plaintiff.

9. Attached hereto as **Exhibit H** is a true and correct copy of *Villasenor v. American Signature, Inc.*, 2008 WL 904888 (N.D. Ill. Mar. 31, 2008).
10. Attached hereto as **Exhibit I** is a true and correct copy of *Wallace Acquisitions, Inc. v. Allied Waste Indus., Inc.*, 1999 WL 239461 (Ill. App. 2d. Apr. 23, 1999).

11. Attached hereto as **Exhibit J** is a true and correct copy of *Ba Lam v. County of Ramsey*, 2009 WL 173523 (Minn. App. Jan. 27, 2009).

FURTHER THIS AFFIANT SAYETH NAUGHT.

/s/Meghan E. Lind

Subscribed and sworn to before me
This 11th day of May, 2009.

/s/Margaret M. Rodewald
Notary Public